

Exhibit “B”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
EDUARDO LI,

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S, LONDON,
AXIS SPECIALTY EUROPE SE;

Defendants-Petitioners.
----- X

Civil Action No.:

DECLARATION OF GARY MANN

I, Gary Mann, declare as follows:

1. I serve as a Senior Claims Adjuster for Brit Global Specialty ("Brit"), an insurer organized under English law with headquarters in London. Brit serves as the managing agent of a Lloyd's underwriting syndicate known as Syndicate 2987, which is part of the defendant Certain Underwriters at Lloyd's London named as a defendant in this action.

2. I have reviewed the pleadings in this Action and submit this Declaration in support of the Certain Underwriters at Lloyd's notice of removal of the foregoing case to the United States District Court for the Eastern District of New York, New York division.

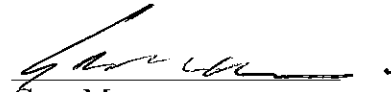
3. CERTAIN UNDERWRITERS AT LLOYD'S, LONDON is an insurance market within a principal place of business in London, England.

4. Directors and Officers Legal Liability Policy No. LI1413318 ("Policy") issued to the Federation Internationale de Football Association (FIFA) is comprised of the following:

- Brit is organized pursuant to the laws of the United Kingdom and has a principal place of business in London, England. Brit as the Slip Leader is authorized to act on behalf of the others subscribing to this Policy.

- Nexus Underwriting Ltd., Syndicate No. 9860, is organized pursuant to the laws of the United Kingdom and has a principal place of business in London, England.
- Starr Financial Lines Consortium, Syndicate No. 9885, is organized pursuant to the laws of the United Kingdom and has a principal place of business in London, England.
- QBE, Syndicate No. 1886, is organized pursuant to the laws of the United Kingdom and has a principal place of business in London, England.
- AXIS, Syndicate No. 1686, is organized pursuant to the laws of the United Kingdom and has a principal place of business in London, England.

Signed under the pains and penalties of perjury on this 23 day of October 2015.


Gary Mann